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May 22, 2020

BY ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *M.G., et al. v. N.Y. City Dep't of Educ., et al.*
13 Civ. 4639 (SHS) (RWL)

Dear Judge Lehrburger:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel assigned to represent the City Defendants in the above-referenced case. I write jointly with counsel for the other parties to respectfully request additional time to submit a revised discovery schedule.

Pursuant to the Court's Order dated February 5, 2020, the parties were to meet and confer regarding a revised discovery schedule and submit a proposed schedule by today, May 22, 2020 (or within 21 days of the filing of the Fifth Amended Complaint). The parties respectfully request that the Court grant them an additional two weeks, or until June 5, 2020, to submit a proposed revised schedule. Though the parties have met and conferred regarding a proposed schedule drafted by Plaintiffs, additional time is needed for the parties to further consider and discuss the draft schedule. Among other things, Plaintiffs and City Defendants need to discuss Plaintiffs' request for the City Defendants to supplement their production of impartial hearing data and records, which is presently referenced in paragraphs 2-4 of the Court's February 5, 2020 Order. Also, City Defendants require more time to consider this part of the proposed schedule, whether we will agree to the production and, if so, how long it will take to complete.

Accordingly, the parties respectfully request an additional two weeks to complete this process. This is the first such request made by the parties, and as indicated, the request is made jointly. The parties apologize for the timing of the request and to the extent that it is not consistent with provisions of the Court's Individual Practices in Civil Cases.

Thank you for your consideration of this matter, and we all hope that Your Honor, your colleagues at the Court, and your families, are all remaining safe and healthy during this time.

Respectfully submitted,

s/

Andrew J. Rauchberg
Assistant Corporation Counsel

cc: All Counsel of Record

SO ORDERED:

5/22/2020



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE